

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SYRACUSE MOUNTAINS CORPORATION,

Plaintiff,

v.

PETRÓLEOS DE VENEZUELA, S.A.

Defendant.

Case No.: 1:21-cv-02684-VEC

**ORAL ARGUMENT
REQUESTED**

NOTICE OF DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, statement of material facts pursuant to Local Civil Rule 56.1, and the declaration of Kevin P. Broughel, dated September 1, 2023, and the exhibits annexed thereto, Defendant Petróleos de Venezuela, S.A. (“PDVSA”) will move this Court for an order pursuant to Federal Rule of Civil Procedure 56 granting summary judgment in PDVSA’s favor and against Plaintiff Syracuse Mountains Corporation (“Plaintiff”) on all claims and defenses.

PLEASE TAKE FURTHER NOTICE that any opposition to this motion shall be served on or before September 29, 2023, and that PDVSA’s reply shall be served on or before October 13, 2023.

Dated: September 1, 2023
New York, New York

PAUL HASTINGS LLP

s/Kurt W. Hansson

Kurt W. Hansson

Kevin P. Broughel

James L. Ferguson

Zachary D. Melvin (*application pending*)

200 Park Avenue

New York, New York 10166

Telephone: 212-318-6000

Facsimile: 212-319-4090

kurthansson@paulhastings.com

kevinbroughel@paulhastings.com

jamesferguson@paulhastings.com

zacharymelvin@paulhastings.com

Counsel for Defendant Petróleos de Venezuela, S.A.